

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

The Target META Account,  
described in Attachment A

Case No. MJ23-552

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, incorporated herein by reference

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section  
21 U.S.C. 841(a)(1), 846  
18 USC 1956

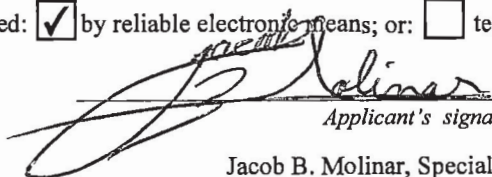
Offense Description  
Drug Trafficking, Conspiracy  
Money Laundering

The application is based on these facts:

- ☒ See Affidavit of DEA Special Agent Jacob Molinar, continued on the attached sheet.

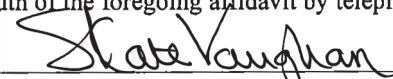
- ☒ Delayed notice of 90 days (give exact ending date if more than 30 days: 02/13/2024) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.

  
Applicant's signature  
Jacob B. Molinar, Special Agent (DEA)  
Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or  
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 11/15/2023

  
Judge's signature

City and state: Seattle, Washington

S. Kate Vaughan, United States Magistrate Judge  
Printed name and title

# AFFIDAVIT OF JACOB MOLINAR

STATE OF WASHINGTON           )  
  )           SS  
COUNTY OF KING             )

I, JACOB MOLINAR, a Special Agent with the Drug Enforcement Agency (DEA), having been duly sworn, state as follows:

## INTRODUCTION AND AGENT BACKGROUND

1. I am employed as a Special Agent with the United States Drug Enforcement Administration (“DEA”), and have been so employed since March of 2021. Accordingly, I am an investigative or law enforcement officer within the meaning of Section 2510(7) of Title 18, United States Code. I am currently assigned to the Seattle Field Division. In this capacity, I investigate violations of the Controlled Substances Act, Title 21, United States Code, Section 801 *et seq.*, and related offenses. I have received specialized training in the enforcement and investigation of the Controlled Substances Act. I have received over 620 hours of training, including, but not limited to, drug identification, drug interdiction, detection, money laundering techniques and schemes, smuggling, and the investigation of individuals and/or organizations involved in the illegal possession, possession for sale, sales, importation, smuggling, cultivation, manufacturing, and illicit trafficking of controlled substances. In my role as a Special Agent, I have been involved in investigations of individuals who have smuggled, received, and distributed controlled substances, including heroin, fentanyl, cocaine, and methamphetamine, as well as the seizure of illegal narcotics and proceeds of the sale of those narcotics. Furthermore, I am familiar with how drug traffickers conduct their business, including, but not limited to, their methods of importing and distributing drugs, their use of communication devices (cellular telephones, cellphone applications, etc.) to facilitate their illegal efforts, their use of social media platforms to facilitate and/or

1 discuss illegal drug transactions, and their use of numerical codes and code words to  
2 conduct their illegal transactions.

3       2. I have familiarized myself with various tactics, tools, methods, trends,  
4 paraphernalia, and related articles utilized by various narcotics traffickers in their efforts  
5 to import, export, conceal, and distribute controlled substances. I am also familiar with  
6 the manner in which drug traffickers use telephones, often cellular telephones, to conduct  
7 their unlawful operations, and how they code their conversations to disguise their  
8 unlawful activities. I am also fluent in Spanish, as it is my first language, and am familiar  
9 with various Spanish terms used in drug conversations. This is an advantage when  
10 investigating narcotics traffickers who primarily speak and communicate among each  
11 other in Spanish. I continue to refine my knowledge in the Spanish lingo used by drug  
12 traffickers based on the region they are from.

13       3. I have participated in the debriefing of defendants, witnesses, and  
14 informants, during which time I have discussed with them their methods of drug  
15 smuggling, distribution, packaging, trafficking, avoiding law enforcement, and  
16 laundering proceeds, among other concerns related to drug trafficking. I have discussed  
17 and learned from other law enforcement investigators regarding these matters as well.

18       4. I make this affidavit in support of an application for a search warrant for  
19 information associated with Instagram handle “633419\_5.7”, and Account Identifier  
20 5314869686 (**Target Account**) that is stored at premises owned, maintained, controlled,  
21 or operated by Meta Platforms, Inc. (“Meta”), an electronic communications service  
22 and/or remote computing service provider headquartered at 1601 Willow Road in Menlo  
23 Park, California. The information to be searched is described in the following paragraphs  
24 and in Attachment A. This affidavit is made in support of an application for a search  
25 warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Meta to  
26 disclose to the government copies of the information (including the content of  
27 communications) further described in Section I of Attachment B. Upon receipt of the

1 information described in Section I of Attachment B, government-authorized persons will  
2 review that information to locate the items described in Section II of Attachment B.

3 5. The facts set forth in this affidavit are based on my own personal  
4 knowledge; knowledge obtained from other individuals during my participation in this  
5 investigation, including other experienced narcotics investigators and law enforcement  
6 officers; review of documents and records related to this investigation; communications  
7 with others who have personal knowledge of the events and circumstances described  
8 herein; and information gained through my training and experience. Because this  
9 affidavit is submitted for the limited purpose of establishing probable cause in support of  
10 the application for a search warrant, it does not set forth every fact that I or others have  
11 learned during this investigation.

12 6. Based on my training and experience and the facts as set forth in this  
13 affidavit, there is probable cause to believe that Damian PINA-RAYMUNDO and other  
14 members of the Jay Thrax drug trafficking organization (DTO) have committed, are  
15 committing, and will continue to commit violations of 21 U.S.C. §§ 841(a)(1) and 846  
16 (drug trafficking, conspiracy) and 18 U.S.C. § 1956 (money laundering). There is  
17 probable cause to believe that PINA-RAYMUNDO is the user of the **Target Account**  
18 and is using his linked Instagram account(s) to commit those crimes. There is also  
19 probable cause to search the information described in Attachment A for evidence and  
20 instrumentalities of these crimes as further described in Attachment B.

### 21 **JURISDICTION**

22 7. This Court has jurisdiction to issue the requested warrant because it is “a  
23 court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a),  
24 (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . .  
25 that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

**SUMMARY OF INVESTIGATION & SOURCES OF INFORMATION**

8. I participated in the investigation described in this affidavit since December 2022. I obtained the facts set forth in this affidavit through personal participation in the investigation described below, from oral and written reports of other law enforcement officers, from records, documents and other evidence obtained during this investigation, and from confidential sources and sources of information who are associated with, and knowledgeable about, the subjects of this investigation and their confederates. I have obtained and read official reports prepared by various law enforcement officers participating in this investigation and in the other related investigations by agencies referenced in this affidavit.

9. When this affidavit refers to vehicle ownership, either I or other agents<sup>1</sup> involved in the investigation reviewed the relevant state vehicle records from the Washington State Department of Licensing (DOL), or the equivalent agency in other states. Similarly, when this affidavit refers to identification documents, either I or other agents involved in the investigation reviewed the relevant driver's license or similar records maintained by DOL, or the equivalent agencies in other states. When this affidavit refers to the criminal history of a subject, either I or other agents involved in the investigation reviewed the available criminal history from state or federal agencies. When this affidavit refers to telephone subscription records, either I or other agents involved in the investigation reviewed the subscriber records obtained from the telephone company by administrative subpoena or court order, or I obtained the information from other law enforcement officers familiar with this investigation. When this affidavit refers to telephone toll records, either I or other agents involved in the investigation received the

---

<sup>1</sup> When I use the term "agents" or "investigators" throughout the affidavit, I am referring to law enforcement personnel, including, but not limited to DEA and FBI agents and task force officers, Seattle Police Department sergeants, detectives, and officers; and Snohomish Regional Drug and Gang Task Force agents, as well as personnel associated with other state and federal law enforcement agencies.

1 information from the telephone company pursuant to an administrative subpoena or court  
 2 authorized pen registers. When this affidavit refers to beliefs or conclusions of  
 3 investigators, these beliefs and conclusions are based on the collective training and  
 4 experience of the agents involved in this investigation.

5 10. Since this affidavit is submitted for the limited purpose of securing  
 6 authorization for search warrants on the above listed social media account, I have not  
 7 included every fact known concerning this investigation. I have set forth the facts that I  
 8 believe are necessary for a fair determination of probable cause for the requested search  
 9 warrants.

### 10 THE INVESTIGATION

#### 11 December 2022 Investigation of Mohamed MUSE

12 11. The United States, including the Drug Enforcement Administration, is  
 13 investigating the drug distribution activities of the Jay Thrax DTO and its members,  
 14 which investigators believe include Hector Jacobo Duran ALDACO, Enrique PINA-  
 15 RAYMUNDO, Francisco PINA RAYMUNDO, Damian PINA-RAYMUNDO, Brian  
 16 LOPEZ, Jonnatan CISNEROS, Juan David CARMONA TOVAR and any associates  
 17 known and unknown regarding possible violations of 21 U.S.C. § 841(a)(1) (Distribution  
 18 of a Controlled Substance, Possession of a Controlled Substance with Intent to  
 19 Distribute); 21 U.S.C. §§ 841(a)(1) and 846 (Conspiracy to Distribute, and to Possess  
 20 with the Intent to Distribute, Controlled Substances); 18 U.S.C. § 924(c) (Possessing a  
 21 Firearm in Furtherance of a Drug Trafficking Offense).

22 12. In December 2022, a Confidential Source 1<sup>2</sup> (Hereinafter referred to as  
 23 CS1) provided information to the DEA and FBI investigators regarding an individual,  
 24 \_\_\_\_\_

25 <sup>2</sup>CS1 has been a confidential source with the Seattle Police Department (SPD) since fall of 2007. CS1 was a confidential source  
 26 for the FBI from summer of 2014 to spring of 2015. CS1 was not closed for cause by the FBI, and the FBI re-activated CS1 as a  
 27 source as of January 2023. CS1 has provided credible and reliable information in the past on other narcotics, firearms, and gang  
 investigations, which has been corroborated by physical surveillance and independent source reporting and led to numerous  
 federal arrests and search warrant executions. CS1 has gross misdemeanor or misdemeanor convictions, all from over six years  
 ago, for criminal trespass, criminal impersonation, drug possession solicitation (providing false information on a prescription),



known as “A-town” who was later identified as Mohamed MUSE. CS1 confirmed MUSE was “A-town” when investigators showed CS1 a driver’s license photo of MUSE. CS1 informed investigators that MUSE was a narcotics dealer and often carried a firearm. CS1 also provided investigators with a telephone number (TT1) for MUSE.

13. During the investigation into MUSE, between late December 2022 and early January 2023, agents determined he was associated with two locations, 23420 91<sup>st</sup> Ave S. Apt 303, Kent, WA 98031 (hereinafter “Premises #1”), and 19802 48<sup>th</sup> Ave West, Building “O,” Apt. 2, Lynwood, WA 98036 (hereinafter “Premises #2”). Based on surveillance, agents believed that MUSE was using both Premises #1 and #2 to further his drug trafficking activities. Investigators also determined that MUSE was associated with a black Dodge Challenger [Temporary Washington State License plate A5084786] (hereinafter “Vehicle #1”). Investigators believed that MUSE conducted multiple hand-to-hand transactions while in Vehicle #1. On January 30, 2023, The Honorable John L. Weinberg, United States Magistrate Judge, signed Search Warrants for Premises #1, Vehicle #1, and for Mohamed MUSE’S person. On February 1, 2023, The Honorable Mary Alice Theiler, United States Magistrate Judge, signed a search warrant for Premises #2.

14. On February 2, 2023, Investigators executed warrants on Premises #1 and #2. MUSE was taken into custody during the search of Premises #2. During the search of Premises #2 investigators found approximately 364.2 grams of a white powdery substance, which was later field tested and found positive for cocaine. Investigators also found approximately 293.2 grams of blue pills stamped with M and 30, which were later field tested and found positive for fentanyl. The narcotics were located in the closet of the sole bedroom of the apartment. Investigators also found two loaded firearms in a

---

driving with suspended license, and violation of the Uniform Controlled Substances Act. CS1 is a paid informant, is not working off a charge, and is not willing to testify in court in connection with this investigation.

1 backpack on the floor of the bedroom. Investigators found a third unloaded firearm in a  
2 cupboard in the kitchen. As discussed in detail below, when MUSE spoke with agents, he  
3 told agents that the contents of the bedroom belonged to him, specifically taking  
4 ownership of the narcotics and firearms recovered.

5 15. A short time before investigators executed the search warrant on Premises  
6 #1, at approximately 2:00 a.m., investigators observed a heavy-set Hispanic male, later  
7 identified as Brian LOPEZ, exit Premises #1 at the same time a dark sedan drove into the  
8 parking lot. LOPEZ and the vehicle appeared to meet in an area outside my view for a  
9 short time, then LOPEZ returned to Premises #1 and the sedan departed. At  
10 approximately 2:45 a.m., investigators observed the same type of interaction involving  
11 LOPEZ with a different vehicle. Investigators then observed someone in Premises #1  
12 looking out the window at the vehicle where investigators were sitting, which was an  
13 unmarked unit. Investigators moved the vehicle around the corner and out of sight of  
14 Premises #1, then got out on foot and observed the entrance for Premises #1 from cover.  
15 Investigators observed LOPEZ and another Hispanic male exit from the stairwell that  
16 leads to Premises #1 and walk in the direction of the investigator's unmarked vehicle.  
17 Investigators remained hidden and observed the individuals approach the vehicle in such  
18 a way as to remain hidden from any potential occupants of the unmarked vehicle, crouch  
19 and close alongside the vehicle. Investigators then observed LOPEZ look into the  
20 unmarked vehicle, which had no one inside. Investigators heard LOPEZ strike the rear  
21 passenger side tire twice and then heard air escaping. Investigators then observed LOPEZ  
22 and the other Hispanic male return in the direction of Premises #1. A few minutes later,  
23 an investigator observed a dark sedan speeding out of the parking lot.

24 16. After investigators observed the dark sedan exit the parking lot,  
25 investigators executed the warrant at Premises #1. Inside Premises #1, investigators  
26 found a safe in a bag in the living room. The safe contained approximately 1,194.8 grams  
27 of a white powdery substance wrapped in blue tape with "CHU" written in black marker.



1 The substance was later field tested and tested positive for cocaine. Also, within the safe  
2 were several documents with the name "Mohamed MUSE", including official court  
3 documents. Investigators found approximately four ounces of a white powdery substance  
4 in a drawer in the bathroom which was later field tested and tested positive for cocaine as  
5 well as 326.1 grams of suspected Xanax pills.

6 17. Investigators believe that after LOPEZ and the other unidentified Hispanic  
7 male that approached the investigators unmarked vehicle, they re-entered Premises #1  
8 and removed narcotics from Premises #1 before leaving the apartment complex.

9 Interview of Mohamad MUSE

10 18. After the execution of both warrants, investigators read MUSE his Miranda  
11 rights and MUSE agreed to waive his rights and speak with investigators.<sup>3</sup> During this  
12 interview, MUSE stated that the narcotics found in the safe at Premises #1 were his, but  
13 nothing outside of the safe. MUSE also stated that the narcotics and firearms at Premises  
14 #2 were his.

15 19. MUSE provided information on the source of supply for his narcotics and  
16 gave investigators the password to his cellphone (hereinafter "TT1")<sup>4</sup> which had  
17 numerous conversations with various individuals relating to narcotics trafficking. MUSE  
18 stated that he had lived at Premises #1 starting in the summer of 2022. MUSE stated that  
19 he recently moved out of Premises #1 because his roommates, who were his sources of  
20 supply, were keeping large amounts of drugs in Premises #1 and selling narcotics directly  
21 from Premises #1. MUSE stated that he did not like the risks associated with selling that  
22

---

23 <sup>3</sup> MUSE, who was subsequently charged by complaint, did not receive and was not promised any benefit for  
24 providing this information to agents. MUSE was expressly advised by agents that they could not make any promises.  
25 Agents believe, however, that MUSE provided the information in hopes of receiving leniency for any charges and  
26 sentencing stemming from the arrest. Agents conducted a criminal history check for MUSE, which showed he had  
27 three Washington state felony convictions for Manufacturing/Delivering amphetamine/methamphetamine (2017),  
malicious mischief (2008), and assault in the third degree (2008). MUSE also had three Washington state non-felony  
convictions for reckless driving and domestic violence violations of no contact orders.

<sup>4</sup> TT1 was the same number provided by CS1 at the beginning of the investigation.

1 quantity of narcotics, so he moved to Premises #2. During the interview, MUSE indicated  
2 that he thought that investigators had arrested other individuals and seized narcotics at  
3 Premises #1 and stated that the kilogram of cocaine seized in the safe at Premises #1 was  
4 his, but nothing else in Premises #1. MUSE told investigators that he had seen as many as  
5 300,000 fentanyl pills, several pounds of methamphetamine, and 10 or 12 kilograms of  
6 cocaine at one point in Premises #1. MUSE told investigators that his roommates  
7 received deliveries every week and that the deliveries were made in rental cars and  
8 picked up in California. MUSE also said that he purchased the fentanyl pills for \$0.50 per  
9 pill. MUSE told investigators that he had observed the roommates carrying firearms.  
10 Investigators asked MUSE about the yellow Volkswagen with Utah license plate F562KJ  
11 which was referenced above and observed by investigators being utilized by MUSE and  
12 LOPEZ in the suspected distribution of narcotics. MUSE stated that the vehicle was at  
13 “their” [MUSE’S roommates] father’s house being repaired.

14 20. MUSE stated that the individual in charge of Premises #1 was known as  
15 “Lil Moggis” but was also known to MUSE as “Brian.” MUSE showed investigators a  
16 snapchat video on TT1 from his snapchat account taken in the area of South Holgate  
17 Street and Airport Way South. Investigators identified this individual as the same  
18 individual observed entering and exiting Premises #1 and slashing the tire of the  
19 unmarked surveillance vehicle as referenced above. MUSE identified him as “Lil  
20 Moggis.” Investigators later identified this individual as Brian LOPEZ based on renter  
21 documents for Premises #1 and LOPEZ’S driver’s license photo. MUSE also showed  
22 investigators text message conversations on WhatsApp with a phone number 206-830-  
23 8504 (TT2) which was saved in TT1 as “Lil Moggis.” MUSE confirmed that this was the  
24 number he used to communicate with “Lil Moggis”/“Brian.”

25 21. MUSE informed investigators that the individual who was in charge of the  
26 entire operation and who brought MUSE into the narcotics operation was known to him  
27 only as “Jay Thrax.” MUSE said he met “Jay Thrax” in the summer of 2022, moving into

1 Premise #1 shortly after. Investigators believed that Jay Thrax was an alias and it was not  
2 until later that they identified his real name as DURAN ALDACO According to MUSE,  
3 Jay Thrax oversaw the entire narcotics operation and told them what to do. MUSE stated  
4 that Jay Thrax received the narcotics from a Mexican based source of supply. MUSE  
5 showed investigators the Snapchat account “J.thaxio” with a display name of “JThrax” on  
6 TT1’s Snapchat account.

7 22. The same day investigators executed the search warrants on Premises #1  
8 and #2, 209-875-4167 (A phone number believed to be used by Hector Jacobo DURAN  
9 ALDACO, hereinafter referred to as TT4) called MUSE at TT1 twice, once at 3:54 a.m.  
10 and again at 4:33 a.m. Both calls occurred after the search warrant team had made entry  
11 into the locations and MUSE and TT1 were in law enforcement custody. Immediately  
12 following the last call, at 4:34 a.m., TT4 texted MUSE, using TT1: “Yo spot got door  
13 kick down nothing was there but your safe call me when u see this” followed by “Nobody  
14 was inside.” I believe, based on what was recovered during the execution of the search  
15 that DURAN ALDACO was referencing MUSE’s safe containing narcotics recovered  
16 from Premises #2.

17 23. Investigators believe that DURAN ALDACO is the leader of the Jay Thrax  
18 DTO and was supplying MUSE with narcotics. Investigators further believe that  
19 Premises #1 was a stash house that stored large amounts of different narcotics for the Jay  
20 Thrax DTO. Investigators also believe that LOPEZ was the individual in charge of  
21 safekeeping Premises #1, and that LOPEZ continues to associate with and assist the Jay  
22 Thrax DTO with the trafficking of narcotics, as further described below.

23 24. Following MUSE’s conversation with investigators, he was placed under  
24 arrest for Possession of Controlled Substances with Intent to Distribute. On March 1,  
25 2023, MUSE was indicted on two counts of Possession of Controlled Substances with  
26 Intent to Deliver, and one count of Possession of a Firearm in Furtherance of a Drug  
27 Trafficking Crime in the Western District of Washington.

1           25.     Shortly after the execution of Premises #1, investigators learned that  
2 LOPEZ called the apartment management office on a recorded line. In the recording,  
3 LOPEZ stated he was not involved with the narcotics that were found in Premises #1, but  
4 that he did not want to return to Premises #1. LOPEZ stated, "I'm not somebody that's  
5 big. I'm pretty much a nobody."

6           26.     On February 10, 2023, investigators observed LOPEZ return and access  
7 Premises #1 along with several other individuals. LOPEZ told the property management  
8 team that these individuals were family to help him clear Premises #1 of his personal  
9 property.

10 Controlled Purchase conducted on June 27, 2023

11           27.     On June 27, 2023, SPD conducted a controlled purchase of one pound of  
12 methamphetamine and 1,000 rainbow colored fentanyl pills from a suspect later  
13 identified as Sigifredo Quiroz ESPINOZA. ESPINOZA met with CS6 at a predetermined  
14 location. When ESPINOZA arrived, he did not have the narcotics with him. An  
15 individual, later identified as Enrique PINA-RAYMUNDO from surveillance photos,  
16 driving a black Cadillac Escalade arrived, retrieved a bag from the back seat of the  
17 vehicle, and met with ESPINOZA in the parking lot. Enrique PINA-RAYMUNDO gave  
18 the bag to ESPINOZA, which ESPINOZA later gave to CS6. The bag contained the  
19 purchased narcotics, one pound of methamphetamine and 1,000 rainbow colored fentanyl  
20 pills.

21           28.     SPD detectives followed Enrique PINA-RAYMUNDO from the location of  
22 the narcotics transactions to Premises #3, believed to be the residence of Brian LOPEZ  
23 after the deal. After Enrique PINA-RAYMUNDO left Premises #3, investigators  
24 followed him to his home at 18225 SE 416th Street, Enumclaw, WA.

25           29.     CS6 is known by law enforcement to have been previously involved in the  
26 selling of narcotics. CS6 is not being paid in this investigation and CS6 understands that  
27 he/she must provide only truthful information to law enforcement investigators, and

1 further understands that failure to do so, or providing false information, will lead to  
2 referral of felony drug charges stemming from a Violation of the Uniform Controlled  
3 Substance Act (“VUCSA”) – Delivery and a VUCSA – PWI arrest. CS6 is receiving  
4 consideration with respect to the possible referral on those charges in exchange for  
5 his/her cooperation with law enforcement in this investigation. To my knowledge, CS6  
6 has never given false information, and the information he/she has provided has been  
7 corroborated where possible. CS6 has no prior convictions or arrests. CS6 is not willing  
8 to testify in connection with this case.

9 30. On February 6, 2023, investigators learned that TT4 was intercepted on a  
10 California state T-III investigation. Los Angeles County Sheriff Department (LACSD)  
11 confirmed that on January 10, 2023, TT4 was intercepted 16 times. LACSD confirmed that  
12 the content of those calls was consistent with the user of TT4, DURAN ALDACO,  
13 arranging to meet Manuel SOLORIO on January 10, 2023. SOLORIO was the target of  
14 this California state T-III investigation. The following day, California investigators  
15 arrested SOLORIO with his source of supply, and recovered large quantities of narcotics  
16 to include several kilograms of fentanyl powder, cocaine, and several dozen pounds of  
17 methamphetamine. LACSD believed that the meeting between SOLORIO and DURAN  
18 ALDACO was for SOLORIO to supply DURAN ALDACO with narcotics based on the  
19 intercepts from the T-III investigation.

20 Arrest of Maruicio Romero MARIA

21 31. On March 7, 2023, agents with the FBI, DEA, and Seattle Police  
22 Department executed federal search warrants for the residence, vehicle, and person of an  
23 individual who later became a Cooperating Defendant (hereinafter referred to as CD1).<sup>5</sup>

24  
25 <sup>5</sup> CD1 who was subsequently charged by complaint, did not receive and was not promised any benefits for providing this  
26 information to agents. CD was expressly advised by agents that they could not make any promises. Agents believe; however,  
27 CD1 provided the information in the hopes of receiving leniency for any charges and sentencing stemming from the arrest.  
Agents conducted a criminal history check for CD1, which showed he has three federal felony convictions for possession of  
cocaine base in the form of crack cocaine with intent to distribute, possession of cocaine with intent to distribute, and felon  
in possession of a firearm (2008), numerous federal probation violations with supervised release terminating in or around  
2018, six state felonies for unlawful possession of a firearm in the second degree (1996, 2003), robbery in the second degree

1 Investigators located a variety of suspected narcotics that field tested positive for  
2 fentanyl, cocaine (some substances tested positive for a mixture of cocaine and fentanyl  
3 powder), a mixture or substance containing a detectable amount of methamphetamine, a  
4 loaded semi-automatic pistol, two cell phones, and a wallet containing the driver's license  
5 of CD1. Additionally, investigators located empty plastic baggies consistent with  
6 repackaging narcotics for further redistribution, an unloaded assault-style pistol with no  
7 discernable serial number or manufacture markings with several loaded magazines next  
8 to it. Investigators also located U.S. currency in various denominations.

9 32. During an interview with CD1, CD1 stated that CD1 purchased narcotics  
10 including cocaine, counterfeit M30 fentanyl-laced pills, and methamphetamine, for  
11 distribution from a single supplier, who was later identified as Mauricio Romero  
12 MARIA. CD1 stated CD1 would pay for the narcotics at the time of delivery and  
13 purchased approximately one pound of methamphetamine, a few ounces of cocaine, and  
14 between 2,000 to 3,000 counterfeit M30 fentanyl-laced pills once or twice a week from  
15 MARIA. CD1 subsequently provided agents with verbal and written consent to assume  
16 his identity and use his cell phone to text with MARIA in order to arrange a narcotics  
17 transaction.

18 33. On March 8, 2023, in an undercover capacity, investigators utilized CD1's  
19 cellphone to order narcotics from MARIA. Investigators used the same verbiage that  
20 CD1 had previously used in ordering narcotics via text from MARIA (investigators  
21 believed they ordered 2,000 counterfeit M30 pills and one pound of methamphetamine).  
22 MARIA responded and indicated that he could deliver the ordered requested by  
23 investigators. Investigators surveilled MARIA from Tukwila to Federal Way, WA, where  
24 CD1's residence is located. MARIA was seen driving a black Mercedes Benz sedan.  
25 Once MARIA arrived at CD1's residence, investigators arrested MARIA and took him

26  
27 (1998), possession of cocaine (2002, 2007), rendering criminal assistance in the first degree (2003), and close to 20 non-felony convictions consisting primarily of domestic violence and driving offenses.



1 into custody. Subsequent to the arrest, investigators observed a clear bag containing  
2 suspected methamphetamine on the front passenger seat in plain view inside the  
3 Mercedes. Agents conducted a probable cause search of the Mercedes and located  
4 approximately 10,000 counterfeit M30 suspected fentanyl-laced pills, 1.8 kilograms of  
5 suspected methamphetamine, smaller amounts of suspected cocaine and heroin, and  
6 \$18,761 in U.S. currency.

7 34. During an interview, MARIA provided investigators with the number of one  
8 of his sources of supply for narcotics as 323-841-6393 (hereinafter referred to as TT13).  
9 MARIA described the source of supply as a Hispanic male in his mid-20's and a little taller  
10 than MARIA, which matches the description of Hector Jacobo DURAN ALDACO.  
11 MARIA stated that the source of supply brings drugs from California and that MARIA  
12 purchases approximately 10,000 fentanyl pills and five pounds of meth at a time from this  
13 source. Toll analysis of TT13 showed that TT13 was activated on February 4, 2023, two  
14 days after investigators arrested and interviewed MUSE as detailed above. Toll analysis  
15 showed that TT13 had 17 shared contacts with TT4 including 253-389-7962 (TT12).  
16 Records show that TT12 is subscribed to Enrique PINA-RAYMONDO at 18225 SE 416th  
17 St, Enumclaw, WA 98022. Based on this information investigators believe that that TT13  
18 is a replacement phone for TT4 and both were being used by the same individual, DURAN  
19 ALDACO.

20 35. During a subsequent interview, MARIA stated he had additional quantities  
21 of narcotics stored in his bedroom (6210 S 153rd Street, #5, Tukwila, Washington) and a  
22 firearm. MARIA provided verbal and written consent to search his cellphone and his  
23 bedroom. The search produced approximately 70,000 counterfeit M30 suspected fentanyl-  
24 laced pills, 1.3 kilograms of suspected methamphetamine, 2.3 kilograms of suspected  
25 cocaine, more than half a pound of suspected heroin, hundreds of suspected counterfeit  
26 Xanax pills, one purple and silver handgun bearing serial number BYWK996 on the slide,  
27

1 over \$40,000 in U.S. currency, and a second cell phone. The suspected narcotics were not  
2 field tested but were sent to the DEA laboratory for analysis.

3 36. Investigators located WhatsApp conversations between MARIA and TT13.  
4 The contact's name for TT13 was saved as "Aguas Azulez Perico Nuevo Numero Del  
5 Compa." "Aguas" translates from Spanish to English as "water." Based on my training and  
6 experience, "water" is common slang term used among drug dealers for methamphetamine.  
7 "Azulez" is believed to be "Azules," which translates to "Blues" from Spanish to English.  
8 Based on my training and experience, "Blues" is a common slang term used among drug  
9 dealers for blue M30 fentanyl pills. "Perico" translates from Spanish to English as  
10 "Parakeet." However, I know that "Perico" is a common slang term used by drug dealers  
11 for cocaine. The literal translation of the contact's name "Aguas Azulez Perico Nuevo  
12 Numero Del Compa" to English is "Waters Blues Parakeet New Number Of The Friend."  
13 I believe that MARIA saved this number as the new number of his source of supply for  
14 methamphetamine, fentanyl pills, and cocaine. A review of the conversation between  
15 MARIA and TT13 indicated that MARIA and the user of TT13 were discussing the price  
16 and coordinating the purchase of narcotics.

17 37. Investigators believe that MARIA was being supplied with narcotics by  
18 DURAN ALDACO and DURAN ALDACO was using his newest number (at that time),  
19 TT13, to communicate with MARIA. Investigators believe that DURAN ALDACO is  
20 managing large sales of narcotics to local distributors such as MARIA.

21 Information Provided by Confidential Source 2 (CS2)

22 38. On May 11, 2023, investigators interviewed CS2.<sup>6</sup> CS2 provided  
23 information about the drug trafficking activities of Francisco PINA-CASTELLANOS  
24 \_\_\_\_\_

25 <sup>6</sup> The information provided by CS2 in this investigation is based upon his/her participation in money pickups that  
26 he/she performed at the direction of law enforcement on May 29, 2020, and July 23, 2021. CS2 is a paid DEA  
27 informant who is also working for immigration benefits. CS2 began working with the DEA in 2013. CS2's criminal  
history includes misdemeanor convictions for assault (domestic violence) and harassment (domestic violence), from  
more than 15 years ago, an arrest for DUI from more than 15 years ago, an arrest for illegal entry/false documents  
from more than 15 years ago -resulting in administrative removal from the United States, and another arrest for

1 and his three sons, Francisco, Enrique and Damian PINA-RAYMUNDO. CS2 stated that  
 2 the PINA-RAYMUNDO brothers worked for their father bringing narcotics from  
 3 California and disturbing them in the greater Seattle area. CS2 also stated that the PINA-  
 4 CASTELLANOS family had a great deal of bulk cash that they kept somewhere in the  
 5 Kent, WA area. CS2 shared with investigators how a member of the PINA-  
 6 CASTELLANOS family had complained to CS2 about spending long hours counting  
 7 cash. Based on my training and experience, it is common for narcotics traffickers to deal  
 8 with bulk cash in order to avoid using financial institutions where their activities may be  
 9 flagged as money laundering.

10 Snapchat Return on Account “J.Thraxio” used by Hector Jacobo DURAN ALDACO

11 39. On May 30, 2023, investigators received a return for a Snapchat account for  
 12 the username of “j.thraxio.” Investigators observed several photos and videos of  
 13 individuals brandishing firearms and large amounts of cash. One of the individuals in the  
 14 Snapchat content was identified by investigators as Enrique PINA-RAYMUNDO by  
 15 using his Department of Licensing photo. Investigators were also able to identify  
 16 different individuals using the snapchat username accounts that were in contact with  
 17 DURAN ALDACO through a Snapchat group chat or individual direct messages. Some  
 18 of those individuals include: Enrique, Francisco, and Damian PINA-RAYMUNDO,  
 19 Brian LOPEZ (the same LOPEZ discussed above), and Raul Duran ALDACO (Hector  
 20 Jacobo DURAN ALDACO’s brother).

21 “Narcocorridos”<sup>7</sup> Dedicated to Members of the DTO

22  
 23  
 24 illegal entry from more than 15 years ago - which also resulted in administrative removal from the United States.  
 25 CS2’s information has been instrumental in the seizure of large amounts of illegal drugs and drug proceeds. CS2’s  
 26 information has led to multiple investigations into large-scale money laundering organizations. To my knowledge,  
 27 CS2 has not provided false information during this, or in other investigations.

<sup>7</sup> A Narcocorrido is a genre of Mexican music that mostly uses a danceable, polka rhythmic base. These songs expand on the life and the exploits of drug traffickers. Given the collective contents of the song, investigators believe that this song can be classified as a Narcocorrido.

40. Investigators learned through the course of this investigation that there are two songs<sup>8</sup> which seemingly reference members of the PINA-CASTELLANO family, including Damian PINA-RAYMUNDO whom investigators believe are part of the Jay Thrax DTO. These songs are in the public domain and are accessible through mainstream media outlets such as YouTube and Spotify. Based on my training and experience, it is common for members of DTOs to pay for the services of a band to create and play a song dedicated for themselves or others. The song mentions the nicknames (as discussed of the three brothers, Enrique (Kike), Francisco (Cisco), Damian (Comandante Demon) PINA-RAYMUNDO, and their father, Francisco PINA-CASTELLANOS (Martillo).

41. As of September 12, 2023, the **Target Account** (With a skull emoji on each end) follows the official Instagram pages for both band groups who sing the songs. These band group's Instagram profiles are also following the **Target Account** back.

42. The first song is titled "Comandante Demon" (Commander Demon). The song is structured in different points of views including Commander Demon's. It mentions "Kike (Enrique) and "Cisco" (Francisco) as the brothers of Commander Demon, presumably Damian. The song's lyrics states that Commander Demon's (Damian) father sent for him and said "You are already old, you are going to learn how to work". Investigators believe that this part of the song refers to Damian being educated in the ways of narcotics trafficking. The song also states that Commander Demon is the son of "Martillo" and that "we are here at 100 following his [Martillo's] footsteps." Francisco PINA-CASTELLANOS was arrested in 2019 by the Renton, WA Police Department for controlled substance distribution. At one point in the song, Commander Demon calls themselves "muleteers." Investigators believe that by describing themselves as muleteers,

---

<sup>8</sup> Unless stated otherwise the portions of this affidavit that discuss Spanish to English translations were done by me. I am fluent in both Spanish and English and I am familiar with the Spanish nomenclature including with those used in a drug trafficking context. Unless otherwise noted, the translated portions of words, and sentences discussed in this document reflect the closest English translation or its English equivalent based on my knowledge and experience. The nicknames that are discussed in this affidavit are spelled out based on my knowledge and experience and may be different from how their respective users spell them.

1 they act as drug mule handlers. The song also states that Commander Demon is transiting  
2 in Seattle. The song mentions that Commander Demon sometimes drives luxurious cars  
3 and that his horse(s) have been successful in the races. The song also makes references to  
4 firearms, and how Commander Demons wears name brand clothing. The song makes  
5 references to La Santa Muerte (Holy Death or Saint Death). The song states “Because  
6 there I bring to the Holy Death, if I put it (her) in front of them, their luck will run out. I  
7 entrust myself to the “calaca” [a figure of a skull or skeleton], to protect me I always ask  
8 my skinny lady.” I know that the Holy Death is a female deity found in Mexican folk  
9 Catholicism and is considered a personification of death. Based on my own knowledge  
10 and research, I know that the Holy Death is a common spiritual icon found among  
11 members of drug cartels and other Mexican criminal organizations. Holy Death is often  
12 depicted as a hooded skeleton dressed in different colors and holding objects in her hands  
13 such as a scythe and the earth.

14 43. The statements from this song corresponds with the information  
15 investigators have gathered from CS2. According to CS2, the Jay Thrax DTO’s members  
16 (including the PINA-RAYMUNDO brothers) take turns traveling to California using  
17 rental vehicles in order to pick up narcotics from Mexican sources of supply (SOS) that  
18 have extensions in California. These DTO members then transport the narcotics into the  
19 greater Seattle, Washington area for distribution. The drivers and the occupants of these  
20 drug runs act as drug “mules” and the leaders of the Jay Thrax DTO act as the  
21 “muleteers” just as the song describes. We know from social media pictures that the  
22 leaders of the Jay Thrax DTO like to have and appear to use luxurious cars, wear high  
23 end clothes, wear flashy jewelry and have several firearms. We also know from CS2’s  
24 information that the PINA-RAYMUNDO family has their own horse race team and they  
25 are heavily involved in horse racing in the Emerald Downs Casino.

26 44. The second song is titled “Los Tres Hermanos” (The Three Brothers). The  
27 song is structured in different points of views including the point of view of the subjects

1 of the songs, the three brothers. This song describes the brothers as “three blood brothers  
2 who are in the contraband.” Investigators believe that the contraband mentioned in this  
3 song refers to narcotics. By saying the brothers are in the contraband, investigators  
4 believe the singer is referring the illicit narcotics trafficking business. This song then  
5 explains that they (the three brothers) are always behind the wheel in an Escalade or a car  
6 and that the freeways know them because they are always trafficking them. This again  
7 corresponds with information from CS2: Members of this DTO, including the three  
8 brothers, travel in vehicles to southern states such as California to acquire narcotics and  
9 transport them back north to the greater Seattle, WA area for distribution. The song then  
10 states the brothers as sometimes being in California but that they reside in Seattle. This  
11 corresponds with images investigators have observed from the **Target Account**,  
12 California was a location added to the photos. The song then lists three individuals, Kike,  
13 Cisco, and Damian. These are the same nicknames used in the song described above on  
14 paragraph 42. The song then describes Damian as the youngest, but that he gets  
15 “activated” quickly. The song follows by saying “El Comandante Demonio” (The  
16 Commander Demon) will give his life for his brothers. The song also states how their  
17 father is called “Martillo”, and that he supports them and they support him. The song also  
18 states how “1911” are the squads they are carrying. Investigators believe that this is  
19 referencing a specific kind of firearm. The 1911 is a well-known design for a semi-  
20 automatic pistol. The song also states: “True Religion and also Gucci well that's what we  
21 work for, we risk our skins against the law by trafficking.” Investigators believe that by  
22 referencing these name brand clothing lines as the reason why the three brothers are  
23 risking their own skin by trafficking, it is strongly implying that the brothers are  
24 acquiring monetary means in an illegal manner. In this case trafficking narcotics. The  
25 song then adds “If it's not in an Escalade in a Mercedes we ride. Kent town next to Seattle  
26 is where we are controlling.”  
27



1 Interview of CS3

2 45. On June 8, 2023, investigators interviewed Confidential Source 3 (“CS3”).  
3 CS3 informed investigators that in late April 2023, a vehicle carrying a load of narcotics  
4 destined for Seattle, WA for DURAN was intercepted and narcotics in the vehicle were  
5 seized. Based on this information, investigators contacted California Highway Patrol  
6 (CHP) and requested reports and evidence pertaining to a seizure of narcotics on April  
7 25, 2023. Per CHP reports, CHP officers pulled over a vehicle for traffic infractions and  
8 established reasonable suspicion to conduct a K-9 sniff. The K-9 alerted to the presence  
9 of narcotics and CHP conducted a search of the vehicle. CHP located and seized  
10 approximately 104 pounds of methamphetamine and 25 pounds of suspected fentanyl  
11 laced blue M30 pills. CHP arrested the four occupants of the vehicle, including Jonnatan  
12 CISNEROS and Juan David CARMONA TOVAR. Investigators had previously  
13 identified CISNEROS as an associate of DURAN, which corroborated the information  
14 gave by CS3. During the interview of CS3, CS3 stated that Sebastian Esquivel ROJAS  
15 was an associate of DURAN and assisted in the distribution of narcotics in the greater  
16 Seattle area.

17 46. CS3 was a DEA informant who was working for legal considerations in an  
18 open federal drug trafficking conspiracy case. CS3 was not financially compensated for  
19 their assistance to date. CS3 began working with the DEA in 2022. In exchange for  
20 acting as a confidential source, CS3 had not been adjudicated on the pending case. To my  
21 knowledge the information CS3 has provided to me in the past has proved to be true and  
22 reliable. CS3’s assistance has led to the identification of narcotics trafficking methods,  
23 and corroborated law enforcement intelligence on drug trafficking activities warrant.  
24 Illegal drugs and US currency was located and recovered in these instances. CS3 has  
25 been arrested for DUI and distribution of controlled substances. CS3 is also familiar with  
26 controlled substances through association with persons who use/sell controlled  
27

1 substances. CS3 was told that providing false or misleading information would result in  
2 the termination of our agreement.

3 47. In August 2023, DEA agents were contacted by a Kent Police Department  
4 detective regarding CS3. Officer Nicholas Luntz informed DEA agents that CS3 was  
5 under investigation for impersonating a law enforcement officer. Officer Luntz told DEA  
6 agents that he made contact with CS3, who informed Officer Luntz that CS3 was  
7 working with DEA. During the conversation, CS3 told Officer Luntz that s/he was  
8 working “in the field” in California with their “co-workers” and that they were away  
9 from their computer. CS3 then asked Officer Luntz if he could run a “warrants check” on  
10 a specific individual, CS3’s ex-dating partner. When confronted by DEA agents, CS3  
11 admitted to the conduct. Shortly after being provided this information CS3 was  
12 terminated as a DEA informant. The information detailed in this affidavit was provided  
13 by CS3 prior to his contact with the Kent Police Department, and I believe that this  
14 information is still reliable because it was verified through other sources such as database  
15 checks, toll records, and information received through Court orders.

16 Social Media Photos From Damian PINA-RAYMUNDO’s Social Media

17 48. Throughout the course of this investigation, investigators have observed  
18 social media photos from the **Target Account**. The most recent media investigators  
19 reviewed from the **Target Account** was on November 8, 2023.

20 49. The photos from this account include a picture taken from the point of  
21 view of the driver, presumably Damian, who is behind the wheel of a Toyota on a road  
22 with a location tag as “California.” Another photo was taken from the point of view of an  
23 individual, presumably Damian, sitting in the driver seat inside of a Mercedes vehicle.  
24 The driver can be seen with several thousands (mostly \$100 bills) of dollars being held  
25 by the drivers left hand and spread across the thighs of the driver. It appeared as if the  
26 currency was placed in a manner as to fully display the entire amount of currency.  
27 Investigators reviewed another photo taken from the inside of what appears to be the

1 same Mercedes vehicle. This image was from the point of view of the driver, presumably  
2 Damian. The vehicle appears to be on the road and the driver has what looks like a  
3 diamond plated watch. There is also a 1911 style handgun laid out on the driver's leg.  
4 This is the same handgun style named in the song described on paragraph 44 as the  
5 "squads" that the three brothers carry. The caption of the image states "FREE SICA  
6 FREE KARMA FREE THE FAMILY." These are the nicknames for Jonnatan  
7 CASTELLANOS CISNEROS and Juan David CARMONA TOVAR who had been  
8 incarcerated due to drug trafficking related charges in the state of California as described  
9 in paragraph 45. Investigators believe that the U.S. currency shown in the social media  
10 photos of Damian PINA-RAYMUNDO are narcotics trafficking proceeds. Investigators  
11 further believe that Damian PINA-RAYMUNDO is directly involved with the narcotic  
12 trafficking based on the above described information. Investigators reviewed another  
13 photo where two individuals, presumably Damian PINA-RAYMUNDO and Alex  
14 ESTRADA, are standing facing the camera. The user of **Target Account** tagged another  
15 Instagram user by the vanity username of @ALEX ESTRADA556. Both individuals  
16 have their faces covered with emojis and both are holding what appears to be large  
17 amounts of US currency up to their ears. Another photo from **Target Account** shows a  
18 male, presumably Damian, with the majority of his face covered with a skull emoji. The  
19 males holding what appears to be large amounts of US currency being held by rubber  
20 bands in both hands and holding them up to his ears. There are also large amounts of US  
21 currency laid out on the counter behind the male. Investigators also reviewed another  
22 photo from the **Target Account** that was posted on or around August 21<sup>st</sup>, 2023. The  
23 photo shows an unknown individual, presumably, Damian PINA-RAYMUNDO,  
24 covering his face with approximately 14 stacks of folded US currency.

25 50. On October 10, 2023, investigators reviewed a photo posted on the **Target**  
26 **Account** that same day. The picture was taken from the point of view of a driver of a  
27 vehicle. The driver has his left hand on the wheel and is presumably using his right hand

1 to take a picture of the center counsel area. There are several bundles of U.S. cash  
2 currency wrapped in reddish rubber bands. The bands are stacked on top of each other  
3 with a one-hundred-dollar bill on top. The caption of the photo says “HOY NOMAS”,  
4 which translates to: “Only today”. In the rearview mirror, there is a small toy race jockey  
5 riding a horse dangling next to a rosary. As discussed below, Damian and his family are  
6 involved in race horsing and based on the findings of the investigation, him and his  
7 family are Catholics. There is also a screen on the dashboard that appears to show the  
8 greater Seattle area. Investigators know that individuals involved in the narcotics  
9 trafficking business will sometimes show off their exploits, clothing, firearms, and in this  
10 case, currency on social media. Investigators believe that Damian PINA-RAYMUNDO  
11 posted this photo on his Instagram story series as a way of showing off drug trafficking  
12 proceeds. This is one of the latest of a series of photos investigators believe Damian  
13 PINA-RAYMUNDO has posted in his Instagram account.

14 51. On November 11, 2023, investigators reviewed a video posted on the  
15 **Target Account** that same day. The video displayed one semi-automatic style rifle, four  
16 handguns (two of them are 1911 style handguns), ammunition, pistol magazines, and a  
17 key fob, on a white flat service. The video had a caption saying “My babies” along with  
18 emojis. The key fob strongly resembles a Mercedes logo based on investigator’s research  
19 online. The 1911 style handguns are referenced in the songs listed above.

20 52. On approximately July 7, 2023, investigators received a return of a 2703(d)  
21 request of Damian’s Facebook account (Comandante Demon, Facebook ID: 1000094120)  
22 and learned the Facebook account has an associated number of 253-398-0204 (hereinafter  
23 referred to as Target Telephone 15 or TT15), and an email of  
24 damian.pina.39@gmail.com.

25 53. Investigators also reviewed Facebook photos from the Facebook profile of  
26 Damian PINA-RAYMUNDO with a profile name of “Comandante Demon.” Images  
27 show Damian PINA-RAYMUNDO with what appear to be racehorses. There is also an

1 image of an individual, presumably Damian, walking with a horse. The individual has a  
2 black jacket and a black hat that states: "TEAM MARTILLO SEATTLE, WA".

3 54. Investigators also observed an image of a large statue of "La Santa  
4 Muerte." The statue is sitting down on a dark seat, holding the earth in her left hand and a  
5 Scythe in her right hand. This corresponds with the lyrics of the song discussed above. As  
6 the Facebook picture indicates, Damian PINA-RAYMUNDO is associated in some  
7 manner with "La Santa Muerte" [the Holy Death]. Investigators also reviewed Facebook  
8 photos from the profile of Raul Duran ALDACO (Facebook Profile  
9 ID:105165949918771, Profile name of "Raul Duran"), the younger brother of Hector  
10 Jacob DURAN ALDACO, aka Jay Thrax. One of the photos shows a group of young  
11 men in a party-like scene. Investigators were able to identify Hector Jacobo DURAN  
12 ALDACO, Raul Duran ALDACO, Brian LOPEZ, and two of the brothers, Damian and  
13 Francisco PINA-RAYMUNDO from the group photo. Francisco PINA-RAYMUNDO is  
14 seen wearing a black hat that has "701 El Chaptio" in gold letters. The number 701 refers  
15 to the rank Juakin GUZMAN LOERA (El Chapo), was once given in Forbes list of the  
16 riches people. "701" is also common reference to El Chapo in song lyrics. Investigators  
17 believe that the individuals in the group photo are all part of the Jay Thrax DTO and are  
18 currently working together in order to continue acquiring, transporting, and distributing  
19 illegal narcotics to the greater Seattle area.

20 55. Based on the images and videos investigators have observed from the  
21 **Target Account** and Damian's Facebook account, investigators believe that there is  
22 media content in the **Target Account** that is related to narcotics trafficking and/or can  
23 provide investigators with further evidence regarding the illicit narcotics activities of the  
24 Jay Thrax DTO and its members. Investigators sent a preservation letter to Meta for the  
25 **Target Account** on May 19, 2023.

1 Jail Calls from Juan David CARMONA TOVAR

2 56. Throughout the course of this investigation, investigators have reviewed  
 3 calls made by CARMONA TOVAR from the Merced County John Latorraca  
 4 Correctional Facility. CARMONA TOVAR was one of the individuals that was arrested  
 5 on narcotics charges as discussed above on paragraph 45. Call records show that  
 6 CARMONA TOVAR made an outbound call on April 27, 2023, to 559-323-9121. An  
 7 unidentified Spanish speaking male answered the call (hereinafter referred to as UM1).  
 8 UM1 and CARMONA TOVAR spoke to one another as if they knew each other. At  
 9 times, UM1 referred to CARMONA TOVAR as "Mi CARMONA" (which, translated<sup>9</sup>  
 10 from Spanish means: My CARMONA). At one point in the phone call, UM1  
 11 asked CARMONA TOVAR if CARMONA TOVAR would like UM1 to pass along  
 12 "Carlos's" number. CARMONA TOVAR stated that CARMONA TOVAR already had  
 13 Carlos's phone number. CARMONA TOVAR asked UM1 if UM1 has "Kike's" or  
 14 "Pelon's" phone number. UM1 told CARMONA TOVAR that UM1 has "Martillo's"  
 15 number. CARMONA TOVAR replied by saying "No pos pa' que verda?" Which,  
 16 translated from English to Spanish, means "No, well what for, right?" UM1 then stated  
 17 that UM1 had two phones for "Martillo." UM1 suggested that CARMONA TOVAR call  
 18 "Carlos" to get Kike's and Pelon's number.

19 57. Based on collective information from CS2 and CS3, investigators know  
 20 that Francisco PINA-RAYMUNDO uses the nicknames "Pelon" and "Cisco," Enrique  
 21 PINA-RAYMUNDO uses the nickname "Kike," Damian PINA-RAYMUNDO uses the  
 22 nickname "Comandante Demon" (which translates from Spanish to English as  
 23 \_\_\_\_\_)

24 <sup>9</sup> Unless stated otherwise the portions of this affidavit that discuss Spanish to English translations were done by me.  
 25 I am fluent in both Spanish and English and I am familiar with the Spanish nomenclature including with those used  
 26 in a drug trafficking context. Unless otherwise noted, the translated portions of words, and sentences discussed in  
 27 this document reflect the closest English translation or its English equivalent based on my knowledge and  
 experience. The nicknames that are discussed in this affidavit are spelled out based on my knowledge and  
 experience and may be different from how their respective users spell them.



1 “Commander Demon”), and their father, Francisco PINA-CASTELLANOS uses the  
 2 nickname “Martillo” (which translates from Spanish to English as a “Hammer”).

3 58. Investigators believe that CARMONA TOVAR was in California picking  
 4 up a large load of narcotics from California and bringing it back to the greater Seattle,  
 5 WA area in order to supply the Jay Thrax DTO. By using their nicknames investigators  
 6 believe that CARMONA TOVAR is a member of the Jay Thrax DTO and is associated  
 7 with its other members, Francisco PINA-RAYMUNDO, Enrique PINA-RAYMUNDO,  
 8 and Damian PINA-RAYMUNDO. Investigators believe that statements made during the  
 9 jail calls indicate a strong association to the PINA-RAYMUNDO family to include  
 10 Francisco PINA-CASTELLANOS, also known as, Martillo.

11 59. Investigators reviewed another series of calls made on April 28, 2023, by  
 12 CARMONA TOVAR from the same correctional facility as mentioned above. The  
 13 number that was dialed from CAMRONA TOVAR’s phone line was Target Telephone  
 14 15, a suspected previous phone number used by Damian PINA-RAYMUNDO. These  
 15 were a series of consecutive calls<sup>10</sup> between CARMONA TOVAR’s phone line and  
 16 Target Telephone 15. During one of the phone calls CARMONA TOVAR expresses to  
 17 Damian the difficulties of being incarcerated. Damian tells CARMONA TOVAR that  
 18 “we are your family, usted no se augite de nada, you know we got’chu”. The Spanish  
 19 portions translate to: You don’t worry about anything.” CARMONA TOVAR then tells  
 20 Damian “¿Dile aquel que no se olvide de uno a la verga, you know?” Which translates to:  
 21 Tell that guy to not forget about one, to the dick<sup>11</sup>, you know? Damian then responds in  
 22 Spanish, “I know, bro. What was I going to tell you, and that’s for sure, that’s for sure,  
 23

24 <sup>10</sup> Some of the conversations described in this affidavit were done in both English and Spanish. I provided the  
 25 translation and/or the closest English equivalent to what is being said. The written translations may be mixtures of  
 the English and Spanish conversations the individuals said.

26 <sup>11</sup> The Spanish term “A la verga” is used to add emphasis to the phrase it is being used in. In this case it can be  
 27 understood as: I’m being serious.

1 that's for sure" CARMONA TOVAR tells Damian in Spanish "Because we are counting  
2 on that, you feel me?" Investigators believe that when CARMONA TOVAR asked  
3 Damian to relay that message to the unnamed individual, CARMONA TOVAR was  
4 referring to Hector Jacobo DURAN ALDACO, the leader of the Jay Thrax DTO.  
5 Investigators believe that CARMONA TOVAR wanted DURAN ALDACO to keep  
6 CARMONA TOVAR in mind since CARMONA TOVAR and Jonnatan CASTELLANO  
7 CISNEROS were incarcerated for transporting narcotics for DURAN ALDACO. Damian  
8 then tells CARMONA TOVAR "Everyday I say that, everyday I tell him, you know what  
9 I mean?" Damian adds by saying "I will tell him to give you a hand and to bring you out,  
10 to the dick, bro because, you know, you already know old man. I wish you were here  
11 outside to talk so we can talk a and shit..." Investigators believe that CARMONA  
12 TOVAR and Damian deliberately refrain from using any names or identifiers when  
13 speaking about this unnamed individual, presumably DURAN ALDACO. They are aware  
14 that these jail calls are recorded and are subject to monitoring.

15 60. Investigators also reviewed another call made to Target Phone 15 on April  
16 28, 2023, by CARMONA TOVAR. A male, presumably Damian, answered, greeted  
17 CARMONA TOVAR and said in Spanish "I'll pass you to Cisco". Cisco is the nickname  
18 used by Francisco PINA-RAYMUNDO, Damian's brother. CARMONA TOVAR asked  
19 the males who he spoke to, presumably Cisco and Damian, to call "Mando" for  
20 CAMRONA TOVAR. Cisco explained to CARMONA TOVAR that Mando was hesitant  
21 about contacting CARMONA TOVAR. Cisco then quoted what Mando had said in  
22 Spanish: "No se pa'que quiere estar hable y hable", you know? "pa'que handa  
23 calentando" you know? Shit like that..." This translates in English to: I don't know why  
24 he wants to be calling and calling, you know? Why is he heating [things] up, you know?  
25 Shit like that. I know from my training and experience that individuals who are involved  
26 in a recent crime and are attempting to elude law enforcement detection will use the  
27 phrase "heated" as a word to describe the status of themselves or another individual. The

1 term “heated” is used to describe an individual who has and/or feels they have a high index  
2 of suspicion of being detected by law enforcement for a crime they were involved in or  
3 associated with. This is also the case among Spanish speaking individuals. Investigators  
4 believe that Mando did not want to be contacted by CAMRONA TOVAR from jail  
5 because Mando did not want to be associated with the charges CARMONA TOVAR was  
6 facing. Later during the call, Cisco can be heard calling Damian before passing the phone  
7 to, presumably Damián PINA-RAYMUNDO. CARMONA TOVAR then calls the male  
8 on the line “Damian”, and the two males, CARMONA TOVAR and Damian, then  
9 continue the conversation.

10 61. Investigators also reviewed a jail call made on April 28, 2023, that was  
11 made to Target Telephone 15. Damian tells CARMONA TOVAR that Damian posted  
12 “Free Sica Free Carma Free the family” This correlates with the photo investigators  
13 reviewed as described on paragraph 49.

14 62. Based on the collective phone conversations, investigators believe that the  
15 individuals who spoke to CARMONA TOVAR as well as the individuals named during  
16 these conversations are members and/or are associated with the Jay Thrax DTO. Target  
17 Telephone 15 was the 4<sup>th</sup> phone number CARMONA TOVAR called after being  
18 incarcerated. Investigators believe Damian PINA-RAYMUNDO is involved in narcotics  
19 trafficking and is associated with the illegal activities that CAMRONA TOVAR was  
20 involved in. Investigators believe that there is media content in the **Target Account** that  
21 is related to narcotics trafficking and/or can provide investigators with further evidence  
22 regarding the illicit narcotics activities of the Jay Thrax DTO and its members, those  
23 known and unknown.

24 //

25 //

26 //

## BACKGROUND INFORMATION ABOUT INSTAGRAM<sup>12</sup>

63. Instagram is a service owned by Meta, a United States company and a provider of an electronic communications service as defined by 18 U.S.C. §§ 3127(1) and 2510. Specifically, Instagram is a free-access social networking service, accessible through its website and its mobile application, that allows subscribers to acquire and use Instagram accounts, like the **Target Account** listed in Attachment A, through which users can share messages, multimedia, and other information with other Instagram users and the general public.

64. Meta collects basic contact and personal identifying information from users during the Instagram registration process. This information, which can later be changed by the user, may include the user's full name, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, credit card or bank account number, and other personal identifiers. Meta keeps records of changes made to this information.

65. Meta also collects and retains information about how each user accesses and uses Instagram. This includes information about the Internet Protocol ("IP") addresses used to create and use an account, unique identifiers and other information about devices and web browsers used to access an account, and session times and durations.

66. Each Instagram account is identified by a unique username chosen by the user. Users can change their usernames whenever they choose but no two users can have the same usernames at the same time. Instagram users can create multiple accounts and, if

---

<sup>12</sup> The information in this section is based on information published by Meta on its Instagram website, including, but not limited to, the following webpages: "Privacy Policy," <https://privacycenter.instagram.com/policy/>; "Information for Law Enforcement," <https://help.instagram.com/494561080557017>; and "Help Center," <https://help.instagram.com>.

1 “added” to the primary account (here, the **Target Account**), can switch between the  
2 associated accounts on a device without having to repeatedly log-in and log-out.

3 67. Instagram users can also connect their Instagram and Facebook accounts to  
4 utilize certain cross-platform features, and multiple Instagram accounts can be connected  
5 to a single Facebook account. Instagram accounts can also be connected to certain third-  
6 party websites and mobile apps for similar functionality. For example, an Instagram user  
7 can “tweet” an image uploaded to Instagram to a connected Twitter account or post it to a  
8 connected Facebook account or transfer an image from Instagram to a connected image  
9 printing service. Meta maintains records of changed Instagram usernames, associated  
10 Instagram accounts, and previous and current connections with accounts on Meta and  
11 third-party websites and mobile apps.

12 68. Instagram users can “follow” other users to receive updates about their  
13 posts and to gain access that might otherwise be restricted by privacy settings (for  
14 example, users can choose whether their posts are visible to anyone or only to their  
15 followers). Users can also “block” other users from viewing their posts and searching for  
16 their account, “mute” users to avoid seeing their posts, and “restrict” users to hide certain  
17 activity and prescreen their comments. Instagram also allows users to create a “close  
18 friends list” for targeting certain communications and activities to a subset of followers.

19 69. Users have several ways to search for friends and associates to follow on  
20 Instagram, such as by allowing Meta to access the contact lists on their devices to identify  
21 which contacts are Instagram users. Meta retains this contact data unless deleted by the  
22 user and periodically syncs with the user’s devices to capture changes and additions.  
23 Users can similarly allow Meta to search an associated Facebook account for friends who  
24 are also Instagram users. Users can also manually search for friends or associates.

25 70. Each Instagram user has a profile page where certain content they create  
26 and share (“posts”) can be viewed either by the public or only the user’s followers,  
27

1 depending on privacy settings. Users can customize their profile by adding their name, a  
2 photo, a short biography (“Bio”), and a website address.

3 71. One of Instagram’s primary features is the ability to create, edit, share, and  
4 interact with photos and short videos. Users can upload photos or videos taken with or  
5 stored on their devices, to which they can apply filters and other visual effects, add a  
6 caption, enter the usernames of other users (“tag”), or add a location. These appear as  
7 posts on the user’s profile. Users can remove posts from their profiles by deleting or  
8 archiving them. Archived posts can be reposted because, unlike deleted posts, they  
9 remain on Meta’s servers.

10 72. Users can interact with posts by liking them, adding or replying to  
11 comments, or sharing them within or outside of Instagram. Users receive notification  
12 when they are tagged in a post by its creator or mentioned in a comment (users can  
13 “mention” others by adding their username to a comment followed by “@”). An  
14 Instagram post created by one user may appear on the profiles or feeds of other users  
15 depending on a number of factors, including privacy settings and which users were  
16 tagged or mentioned.

17 73. An Instagram “story” is similar to a post but can be viewed by other users  
18 for only 24 hours. Stories are automatically saved to the creator’s “Stories Archive” and  
19 remain on Meta’s servers unless manually deleted. The usernames of those who viewed a  
20 story are visible to the story’s creator until 48 hours after the story was posted.

21 74. Instagram allows users to broadcast live video from their profiles. Viewers  
22 can like and add comments to the video while it is live, but the video and any user  
23 interactions are removed from Instagram upon completion unless the creator chooses to  
24 send the video to IGTV, Instagram’s long-form video app.

25 75. Instagram Direct, Instagram’s messaging service, allows users to send  
26 private messages to select individuals or groups. These messages may include text,  
27 photos, videos, posts, videos, profiles, and other information. Participants to a group



1 conversation can name the group and send invitations to others to join. Instagram users  
2 can send individual or group messages with “disappearing” photos or videos that can  
3 only be viewed by recipients once or twice, depending on settings. Senders can’t view  
4 their disappearing messages after they are sent but do have access to each message’s  
5 status, which indicates whether it was delivered, opened, or replayed, and if the recipient  
6 took a screenshot. Instagram Direct also enables users to video chat with each other  
7 directly or in groups.

8       76. Instagram offers services such as Instagram Checkout and Facebook Pay  
9 for users to make purchases, donate money, and conduct other financial transactions  
10 within the Instagram platform as well as on Facebook and other associated websites and  
11 apps. Instagram collects and retains payment information, billing records, and  
12 transactional and other information when these services are utilized.

13       77. Instagram has a search function which allows users to search for accounts  
14 by username, user activity by location, and user activity by hashtag. Hashtags, which are  
15 topical words or phrases preceded by a hash sign (#), can be added to posts to make them  
16 more easily searchable and can be “followed” to generate related updates from Instagram.  
17 Meta retains records of a user’s search history and followed hashtags.

18       78. Meta collects and retains location information relating to the use of an  
19 Instagram account, including user-entered location tags and location information used by  
20 Meta to personalize and target advertisements.

21       79. Meta uses information it gathers from its platforms and other sources about  
22 the demographics, interests, actions, and connections of its users to select and personalize  
23 ads, offers, and other sponsored content. Meta maintains related records for Instagram  
24 users, including information about their perceived ad topic preferences, interactions with  
25 ads, and advertising identifiers. This data can provide insights into a user’s identity and  
26 activities, and it can also reveal potential sources of additional evidence.

1           80. In some cases, Instagram users may communicate directly with Meta about  
2 issues relating to their accounts, such as technical problems, billing inquiries, or  
3 complaints from other users. Social networking providers like Meta typically retain  
4 records about such communications, including records of contacts between the user and  
5 the provider's support services, as well as records of any actions taken by the provider or  
6 user as a result of the communications.

7           81. For each Instagram user, Meta collects and retains the content and other  
8 records described above, sometimes even after it is changed by the user (including  
9 usernames, phone numbers, email addresses, full names, privacy settings, email  
10 addresses, and profile bios and links).

11           **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

12           82. In this investigation, Damian PINA-RAYMUNDO has used various  
13 methods of communication including, but not limited to social media accounts, including  
14 the **Target Account**, to communicate about his (and his DTO's) drug trafficking  
15 activities and to also display evidence of such activity by way of photos, videos,  
16 messages, etc. In my training and experience, evidence of who was using Instagram and  
17 from where, and evidence related to criminal activity of the kind described above, may be  
18 found in the files and records described above. This evidence may establish the "who,  
19 what, why, when, where, and how" of the criminal conduct under investigation, thus  
20 enabling the United States to establish and prove each element or, alternatively, to  
21 exclude the innocent from further suspicion.

22           83. The stored communications and files connected to an Instagram account  
23 also may provide direct evidence of the offenses under investigation. Based on my  
24 training and experience, instant messages, photos, and videos are often created and used  
25 in furtherance of criminal activity, including to communicate and facilitate the offenses  
26 under investigation. In addition, the user's account activity, logs, stored electronic  
27 communications, and other data retained by Meta can indicate who has used or controlled

1 the account. This “user attribution” evidence is analogous to the search for “indicia of  
2 occupancy” while executing a search warrant at a residence. For example, subscriber  
3 information, messaging logs, photos, and videos (and the data associated with the  
4 foregoing, such as date and time) may be evidence of who used or controlled the account  
5 at a relevant time. As an example, because every device has unique hardware and  
6 software identifiers, and because every device that connects to the Internet must use an IP  
7 address, IP address and device identifier information can help to identify which  
8 computers or other devices were used to access the account. Such information also allows  
9 investigators to understand the geographic and chronological context of access, use, and  
10 events relating to the crime under investigation.

11 84. Account activity may also provide relevant insight into the account owner’s  
12 state of mind as it relates to the offenses under investigation. For example, information on  
13 the account may indicate the owner’s motive and intent to commit a crime (e.g.,  
14 information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting  
15 account information in an effort to conceal evidence from law enforcement).

16 85. Other information connected to the use of Instagram may lead to the  
17 discovery of additional evidence. For example, the **Target Account** may reveal other  
18 communication services used in furtherance of the crimes under investigation or services  
19 used to move money between co-conspirators. In addition, information contained in the  
20 **Target Account** can lead to the identification of additional co-conspirators.

21 86. Therefore, Meta’s servers are likely to contain stored electronic  
22 communications and information concerning subscribers and their use of Instagram. In  
23 my training and experience, such information may constitute evidence of the crimes  
24 under investigation including information that can be used to identify the account’s user  
25 or users.

26 //

27 //

**CONCLUSION**

87. Based on the forgoing, I request that the Court issue the proposed search warrant.

88. Pursuant to Title 18, United States Code, Section 2703(g), this application and affidavit for a search warrant seeks authorization to permit Meta, and its agents and employees, to assist agents in the execution of this warrant. Once issued, the search warrant will be presented to Meta with direction that it identifies the **Target Account** described in Attachment A to this affidavit, as well as other subscriber and log records associated with the account, as set forth in Section I of Attachment B to this affidavit. The presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving the warrant on Meta. Because the warrant will be served on Meta, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

89. The search warrant will direct Meta to create an exact copy of the specified account and records.

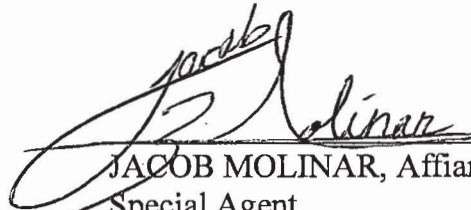
90. I, and/or other law enforcement personnel will thereafter review the copy of the electronically stored data and identify from among that content those items that come within the items identified in Section II to Attachment B, for seizure.

91. Based on my experience and training, and the experience and training of other agents with whom I have communicated, it is necessary to review and seize a variety of communications that identify any users of the **Target Account** and communications sent or received in temporal proximity to incriminating communications that provide context to the incriminating communications.

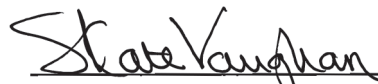
92. This affidavit and application are being presented by reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

**REQUEST FOR SEALING**

93. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may give targets an opportunity to flee/continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior, notify confederates, or otherwise seriously jeopardize the investigation.

  
JACOB MOLINAR, Affiant  
Special Agent  
Drug Enforcement Administration

The above-named agent provided a sworn statement to the truth of the foregoing affidavit by telephone on 15th day of November 2023.

  
S. KATE VAUGHAN  
United States Magistrate Judge

**ATTACHMENT A**

**Account to be Searched**

This warrant applies to information associated with the Instagram account associated with Account Identifier 5314869686 (the **Target Account**) that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc., a company headquartered at 1601 Willow Road, Menlo Park, California.



**ATTACHMENT B****Particular Things to Be Seized****I. Section I - Information to be disclosed by Meta Platforms, Inc. (“Meta”) for search:**

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta, regardless of whether such information is located within or outside of the United States, and including any messages, emails, records, files, logs, or other information that has been deleted but is still available to Meta, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f) on May 19, 2023, Meta is required to disclose the following information to the government for the **Target Account** or identifier listed in Attachment A:

A. All business records and subscriber information, in any form kept, pertaining to the **Target Account**, including:

1. Identity and contact information (past and current), including full name, e-mail addresses, physical address, date of birth, phone numbers, gender, hometown, occupation, websites, and other personal identifiers;

2. All Instagram usernames (past and current) and the date and time each username was active, all associated Instagram and Facebook accounts (including those linked by machine cookie), and all records or other information about connections with Facebook, third-party websites, and mobile apps (whether active, expired, or removed);

3. Length of service (including start date), types of services utilized, purchases, and means and sources of payment (including any credit card or bank account number) and billing records;

4. Devices used to login to or access the **Target Account**, including all device identifiers, attributes, user agent strings, and information about networks and connections, cookies, operating systems, and apps and web browsers;

5. All advertising information, including advertising IDs, ad activity, and ad topic preferences;

6. Internet Protocol (“IP”) addresses used to create, login, and use the account, including associated dates, times, and port numbers, from April 25, 2023, to present;

7. Privacy and account settings, including change history; and

8. Communications between Meta and any person regarding the **Target Account**, including contacts with support services and records of actions taken.

B. All content (whether created, uploaded, or shared by or with the **Target Account**), records, and other information relating to videos (including live videos and videos on IGTV), images, stories and archived stories, past and current bios and profiles, posts and archived posts, captions, tags, nametags, comments, mentions, likes, follows, followed hashtags, shares, invitations, and all associated logs and metadata, from April 25, 2023, to present;

C. All content, records, and other information relating to communications sent from or received by the **Target Account** from April 25, 2023, to present, including but not limited to:

1. The content of all communications sent from or received by the **Target Account**, including direct and group messages, and all associated multimedia and metadata, including deleted and draft content if available;

2. All records and other information about direct, group, and disappearing messages sent from or received by the **Target Account**, including dates and times, methods, sources and destinations (including usernames and account numbers), and status (such as delivered, opened, replayed, screenshot);

3. All records and other information about group conversations and video chats, including dates and times, durations, invitations, and participants (including usernames, account numbers, and date and time of entry and exit); and

4. All associated logs and metadata;

D. All content, records, and other information relating to all other interactions between the **Target Account** and other Instagram users from April 25, 2023, to present, including but not limited to:

1. Interactions by other Instagram users with the **Target Account** or its content, including posts, comments, likes, tags, follows (including unfollows, approved and denied follow requests, and blocks and unblocks), shares, invitations, and mentions;

2. All users the **Target Account** has followed (including the close friends list), unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow, and of users who have followed, unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow the Target Account;

1                   3. All contacts and related sync information; and

2                   4. All associated logs and metadata;

3           E. All records of searches performed by the **Target Account** from April 25,  
4 2023, to present; and

5           F. All location information, including location history, login activity,  
6 information geotags, and related metadata from April 25, 2023, to present.

7           **Meta is hereby ordered to disclose the above information to the government within**  
8 **14 days of issuance of this warrant.**

9 **II. Section II - Information to be seized by the government**

10 All information described above in Section I that constitutes fruits, contraband,  
11 evidence, and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1) and 846 (drug  
12 trafficking, conspiracy) and 18 U.S.C. § 1956 (money laundering), those violations  
13 involving Damian PINA-RAYMUNDO and occurring after April 25, 2023, including, for  
14 the account or identifier listed on Attachment A, information pertaining to the following  
15 matters:

16           (a) Evidence (i.e., photos, videos, stories, messages, comments, and  
17 other communications) showing the distribution of illegal drugs, conspiracy to distribute  
18 controlled substances, the laundering of drug proceeds, and the possession of firearms in  
19 furtherance of drug trafficking activities among, but not limited to, members and  
20 suspected members of the Jay Thrax DTO;

21           (b) Evidence indicating how and when the account was accessed or  
22 used, to determine the geographic and chronological context of account access, use, and  
23 events relating to the crime under investigation and to the account owner;

24           (c) Evidence indicating the account owner's state of mind as it relates to  
25 the crimes under investigation;

26           (d) The identity of the person(s) who created or used the user ID,  
27 including records that help reveal the whereabouts of such person(s); and

          (e) The identity of person(s) who communicated with the user ID about  
the sale, purchase, or distribution of controlled substances and/or related money  
laundering offenses and/or related firearms offenses, including records that help reveal  
their whereabouts.